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December 19, 2012

VIA ELECTRONIC MAIL

The Honorable Denise Cote United States District Court Southern District of New York 500 Pearl Street, Room 1610 New York, NY 10007 >2# 12/21/12

Re: The Associated Press v. Meltwater U.S. Holdings, Inc., et al,

Civ. No. 1:12-01087 (DLC) (FM)

Dear Judge Cote:

I write to briefly follow-up on one point after the conference today.

In our December 17, 2012 letter, we asked the Court to rule that no amici may file a motion to file an amicus brief – or an amicus submission – when their knowledge of the action is based on receipt of documents sealed by the Court. We understand that the Computer and Communications Industry Association ("CCIA") and Electronic Frontier Foundation ("EFF"), in association with the Stanford Fair Use Project, plan to seek leave to file amicus briefs this Friday, December 21, 2012 and will do so based on receipt of the sealed briefs about month ago.

While AP generally does not object to amicus briefs in this action, entities that may wish to file amicus briefs supporting AP's position have not had an opportunity to determine interest because the briefs were all under seal. We respectfully ask the Court to prohibit the filing of amicus briefs from the above entities (or any others that received sealed documents). In the alternative, we respectfully ask that any such filings be adjourned to a later date, with filings being made no earlier than six weeks from the public filing of the record. This would allow all interested parties to proceed on the same footing.

Respectfully yours,

Elizabeth A. McNamara

cc: David H. Kramer, Esq.

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